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July 21, 2008

Honorable Colleen McMahon
United States District Judge
United States Courthouse
500 Pearl Street, Room 640
New York, NY 10007

RE: United States v. Iberca Polanco and Erika Nazario, 07 Cr. 1042 (CM)

Dear Judge McMahon:

I write – with the consent of the government – to seek an adjournment of the pretrial conference in this matter originally set for tomorrow. We have been involved in discussions with Assistant United States Attorney Michael Rosensaft regarding aspects of this case, including a possible disposition. Jeffrey Rubin, counsel for defendant Erika Nazario, has advised that he consents to the proposed adjournment as well.

Your Chambers has advised that September 25, 2008, at 9:30 a.m., would be a date and time convenient for the Court. Accordingly, I respectfully request that the pretrial conference be adjourned until then. Both defendants consent to the exclusion of the additional time from the speedy trial calculation.

MEMO ENDORSED

Sincerely,

Tejal D. Shah

Cc: Jonathan P. Bach,
CJA attorney of record

Michael Rosensaft,
Assistant United States Attorney

Jeffrey M. Rubin
Attorney for defendant Nazario

7/21/08
Matter Adj to 9/25/08 @ 9:30 AM
Time is excluded to allow for
plea discussions and in the
interest of justice